



July 16, 2004

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW  
Washington, DC 20554

Re: **Notice of Oral Ex Parte Presentation. 47 CFR Sec. 1.1206(b)(2)**

**New Part 4 of the Commission's Rules Concerning Disruptions to  
Communications  
ET Docket No. 04-35**

***Amended ex parte notice from July 12, 2004***

Ms. Dortch:

Pursuant to Section 1.1206(b)(2) of the Commission's rules, Alcatel hereby informs the Federal Communications Commission ("Commission") of a July 7, 2004, oral ex parte presentation in the above entitled docket. At this meeting, Mr. Thomas Ferguson of Alcatel discussed several relevant issues with John Healy, Paul Marrangoni, Shanti Gupta, Whitey Taylor of the Commission. The issues included whether rules requiring counting SS7 IAM messages in order to track blocked calls during a service disruption were reasonable and whether rules requiring reporting of possible disruptions within 120 minutes of discovery were reasonable.

Mr. Ferguson stated that it was not reasonable to require the counting of SS7 IAM messages in order to track blocked calls during a service disruption because it is not typical for an STP to count messages at this level. However, a proposal mandating reporting of possible disruptions within 120 minutes could be reasonable so long as it was clear that services restoration is the priority.

Mr. Ferguson also added that the counting of MTP messages was feasible. When counting MTP messages, a conversion factor can be linked to blocked calls. For example, 500,000 lost MTP messages would be equivalent to 90,000 blocked calls.

If you have any questions concerning this filing or Alcatel's position in this docket, please do not hesitate to contact me at 202-715-3709. Thank you.

Sincerely,

/s/

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cc: Tom Ferguson  
John Healy  
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